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4 Attorney for the Creditor DV Energy
5 (Pro Hac Vice Application To be Filed Before the Hearing)

6 IN THE UNITED STATES BANKRUPTCY COURT

7 FOR THE DISTRICT OF DELAWARE

8 In re FTX Trading Ltd., et al.,

Bankruptcy Case No.: No. 22-11068 (JTD)

9 Debtors.

10 Chapter 11
11 (Jointly Administered)

12 **CREDITOR'S # 0409059 OPPOSITION**
13 **TO DEBTORS' ONE HUNDRED**
14 **THIRTIETH (NON-SUBSTANTIVE)**
15 **OMNIBUS OBJECTION TO**
16 **UNVERIFIED CUSTOMER**
17 **ENTITLEMENT CLAIMS**

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Date: 1/23/2025
Time: 10:00 a.m.

1 Claimant No. # **0409059** (the “Creditor”) hereby opposes to **designation of his claim as**
2 **unverified and subject to expungements as requested in DEBTORS’ ONE HUNDRED**
3 **THIRTIETH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO UNVERIFIED**
4 **CUSTOMER ENTITLEMENT CLAIMS** (the “Objection”) and represents as follows:

5 (1) The Creditor files this Opposition slightly belatedly and will be amending it with
6 the Creditor’s declaration of support and other relevant filings shortly.

7 (2) The Creditor timely filed his claim and promptly and properly responded to all
8 requests and submitted all the requested information related to his claim and
9 KYC process/status verification. Despite all his timely efforts his claim
10 verification was subject to numerous non-sensical follow-up requests and
11 delays.

12 (3) The Creditor just hired an attorney to represent him today and his undersigned
13 attorney discovered today’s deadline to file the opposition to the Objection. She
14 had no chance yet to compile all relevant information and file a detailed
15 opposition, however, it appears to be clear from her initial review that the KYC
16 process is being handled in a extremely “creditor-unfriendly” manner,
17 apparently by some sort of automated process, and does not allow creditors a
18 fair and reasonable opportunity to verify their identities.

19 (4) The Creditor respectfully represents that some short-term delay in
20 supplementing this opposition is warranted under the circumstances.

21 Respectfully submitted,

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23 Dated: December 18, 2024

24 /s/ Oxana Kozlov

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27 Oxana Kozlov, attorney for the Creditor